

GERALD REED)
Plaintiff)
vs.)
Perry Kirk)
Defendant)

CASE No: 12 C 8582

APR 19 2013
April 19 2013 MB
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Presiding Judge:

JAMES B. ZAGEL

MOTION For PRELIMINARY INJUNCTION / RESTRAINING ORDER

Now Comes PLAINTIFF GERALD REED pro se. Asking this HONORABLE Judge, JAMES B. ZAGEL, to GRANT A COURT ORDER. RESTRAINING PERPETUAL that prevents DEFENDANT W. PERRY KIRK FROM FURTHERING HARASSING AND THREATENING PLAINTIFF. BECAUSE OF THE COMPLAINT AGAINST DEFENDANT.

Plaintiff will demonstrate that on numerous occasions Defendant has cause threats and HARASSMENTS towards Plaintiff. to ~~scared~~ Plaintiff. with SEGREGATION AND / OR DISCIPLINARY ACTIONS. OF SOME TYPE OF RESTRICTION OF SOME SORT.

1.) On April 14th 2013, Plaintiff was entering the Dining Hall for lunch. When W. Kirk (Defendant) walked up in Plaintiff face threatening him. If he don't get off the YENCE talking he would walk him to segregation.

2.) Plaintiff has not been stopped on the YENCE to talk with anyone. Plaintiff was plainly walking in the Dining Hall to obtain his chow as he often do. when he comes out for chow.

3.) Plaintiff most times stays in his cell. To avoid the HARASSMENT AND THREATS. And / or refuse to not put any more pain onto strain on his leg and hip. which gives him sever pain daily.

4.) Plaintiff is subjected to the use of the crutches AND PUFFY TRAYS
that he goes to the Dining Hall. A friend who is a kind prisoner,
assist in helping Plaintiff with his tray / food to the table.

5.) ON this DATE April 14th. Defendant Plaintiff sees that Plaintiff has
two crutches and can't grab his own tray / tray. AND REFUSE to allow
another prisoner to grab two trays. ONE FOR HIMSELF AND ONE FOR ME.
AS IT IS often done when Plaintiff goes to the Dining Hall.

6.) Most Days the LT. that's in the Dining Hall allows this process to
go teeth. SOMEONE ELSE ASSISTING Plaintiff with his tray. Even the
Food supervisor. Ask that SOMEONE ASSIST A DISABILITY person.
BECAUSE that person is unable to hold on to two crutches and grab
his own tray.

7.) THIS DEFENDANT further HARASS Plaintiff, when he walks pass
Plaintiff's cell each nite. HE CONSTANTLY MAKE DESTRUCTIVE COMMENTS TOWARDS
Plaintiff AND FOR ITEL KNOWING Plaintiff IS SLEEP, WAKING Plaintiff UP, AND STARE
AT Plaintiff.

WHEREFORE Plaintiff ask this Honorable Judge to IN PLACE A
PERMANENT INJUNCTION for A PRELIMINARY INJUNCTION. THAT DEFENDANT
LT. KIRK BE SEPARATED FROM Plaintiff by giving GERALD REED A
RESTRAINING ORDER. AND PLACING DEFENDANT IN NHC. STATEVILLE CORR.
CENTER. IS SEPARATED IN TWO FACILITY ONE FOR MAXIMUM FACILITY AND THE
OTHER PART IS FOR INTAKE / RIFTS / MSC ETC. AND Plaintiff IS ONLY REQUESTING
THAT Plaintiff BE GRANTED THIS INJUNCTION TO PREVENT AND FURTHER
HARASSMENTS, THREATS, AND IN FORM OF HIS LIFE

DATE April 11th 2013

Notify

I, GERALD REED, dePOSE AND STATE under the
penalty of perjury, pursuant to 735 ILCS 5/1-109.07
the code of civil procedure that the foregoing
is true AND CORRECT.

Submitted GERALD REED

GERALD REED PRO-SE

N-32900

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